

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

STATUS REPORT SEPTEMBER 1, 2005

Pursuant to the Court's June 17, 2004 Procedural Order, the undersigned counsel for Plaintiffs and Defendants hereby submit the attached status report to the Court listing the status of all pending motions to date.

Respectfully Submitted,

PLAINTIFFS' LEAD COUNSEL
ON BEHALF OF ALL PLAINTIFFS

By /s/ Thomas M. Sobol
Thomas M. Sobol, Esq. (BBO# 471770)
Edward Notargiacomo, Esq. (BBO# 567636)
HAGENS BERMAN SOBOL SHAPIRO LLP
One Main Street, 4th Floor
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003
LIAISON COUNSEL

DATED: September 1, 2005

Steve W. Berman, Esq.
Sean R. Matt, Esq.
Kevin P. Roddy, Esq.
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594

Samuel Heins, Esq.
Bryan L. Crawford, Esq.
Daniel E. Gustafson, Esq.
HEINS, MILLS & OLSON, P.C.
3550 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: (612) 338-4605
Facsimile: (612) 338-4692

Marc H. Edelson, Esq.
HOFFMAN & EDELSON
45 West Court Street
Doylestown, PA 18901
Telephone: (215) 230-8043
Facsimile: (215) 230-8735

Kenneth A. Wexler, Esq.
Elizabeth Fegan Hartweg, Esq.
THE WEXLER FIRM
One North LaSalle Street, Suite 2000
Chicago, IL 60602
Telephone: (312) 346-2222
Facsimile: (312) 346-0022

Eugene A. Spector, Esq.
Jeffrey L. Kodroff, Esq.
John A. Macoretta, Esq.
SPECTOR, ROSEMAN & KODROFF, P.C.
1818 Market Street, Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300
Facsimile: (215) 496-6611

ON BEHALF OF DEFENDANTS

By /s/ Nicholas C. Theodorou
Nicholas C. Theodorou, Esq. (BBO# 496730)
Jessica Barnett, Esq. (BBO# 650535)
FOLEY HOAG, LLP
155 Seaport Boulevard
Boston, MA 02210

DATED: September 1, 2005

D. Scott Wise, Esq. (admitted *pro hac vice*)
Kimberley Harris, Esq. (admitted *pro hac vice*)
DAVIS POLK & WARDWELL
450 Lexington Avenue
New York, NY 10017

Attorneys for Defendant AstraZeneca
Pharmaceuticals LP

CERTIFICATE OF SERVICE

I hereby certify that I, Thomas M. Sobol, an attorney, caused a true and correct copy of the foregoing Status Report to be served on all counsel of record electronically on September 1, 2005 pursuant to Section D of Case Management Order No. 2.

/s/ Thomas M. Sobol

Thomas M. Sobol, Esq.
HAGENS BERMAN SOBOL SHAPIRO
LLP
One Main Street, 4th Floor
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003

MDL 1456 STATUS CHART – GOVERNMENT ENTITY CASES

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
Montana v. Abbott Labs., Inc. et al.	02-CV-12084-PBS	Removed to D. Mont.	<ul style="list-style-type: none"> • November 24, 2004 – Watson Pharmaceuticals, Inc.’s Motion to Dismiss the State of Montana’s Second Amended Complaint <i>sub judice</i> <ul style="list-style-type: none"> ○ December 8, 2004 – State of Montana’s Opposition to Motion to Dismiss the State of Montana’s Second Amended Complaint ○ December 16, 2004 – Watson Pharmaceuticals, Inc.’s Reply Memorandum in Support of Motion to Dismiss the State of Montana’s Second Amended Complaint (leave to file granted December 21, 2004) ○ June 16, 2005 – Motion referred to Magistrate Judge Marianne B. Bowler. ○ Motion hearing held on July 14, 2005 • July 29, 2005 – Defendants’ Motion to Compel Discovery from Plaintiffs the State of Nevada and the State of Montana <ul style="list-style-type: none"> ○ August 12, 2005 – State of Montana and Nevada’s Opposition to Motion to compel Discovery from States of Montana and Nevada ○ August 16, 2005 – Notice of Hearing on Motion Set for September 19, 2005 before Magistrate Judge Marianne B. Bowler
Nevada v. American Home Products, Inc. et al (“Nevada II”)	02-CV-12086-PBS	Removed to D. Nev.	<ul style="list-style-type: none"> • November 24, 2004 – Watson Pharmaceuticals, Inc.’s Motion to Dismiss the State of Nevada’s Amended Complaint <i>sub judice</i> <ul style="list-style-type: none"> ○ December 8, 2004 – State of Nevada’s Opposition to Motion to Dismiss the State of Nevada’s Second Amended Complaint ○ December 16, 2004 – Watson Pharmaceuticals, Inc.’s Reply Memorandum in Support of Motion to Dismiss the State of Nevada’s Second Amended Complaint (leave to file granted December 21, 2004) ○ June 16, 2005 – Motion referred to Magistrate Judge Marianne B. Bowler. ○ Motion hearing held on July 14, 2005 • July 29, 2005 – Defendants’ Motion to Compel Discovery from Plaintiffs the State of Nevada and the State of Montana <ul style="list-style-type: none"> ○ August 12, 2005 – State of Montana and Nevada’s Opposition to

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
			<ul style="list-style-type: none"> ○ Motion to compel Discovery from States of Montana and Nevada ○ August 16, 2005 – Notice of Hearing on Motion Set for September 19, 2005 before Magistrate Judge Marianne B. Bowler
California ex rel. Ven-A-Care of the Florida Keys, Inc. v. Abbott Labs., Inc. et al.	03-CV-11226-PBS	Removed to C.D. Cal.	<ul style="list-style-type: none"> ● August 25, 2005 – First Amended Complaint in Intervention for Money Damages and Civil Penalties for Violations of the California False Claims Act ○ August 25, 2005 – Motion for Leave to File Unredacted Exhibits to First Amended Complaint in Intervention Under Seal

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
Illinois v. Abbott Laboratories, Inc., Case No. 05-C-4056;	n/a	Removed to N.D. Ill.	<ul style="list-style-type: none"> July 13, 2005 – Notices of Removal filed (based on <i>Grable & Sons Metal Prods., Inc. v. Darue Eng'g & Mfg.</i>, 125 S. Ct. 2363 (June 13, 2005))
Kentucky v. Abbott Laboratories, Inc., Case No. 3:05-CV-48;		Removed to E.D. Ky.	<ul style="list-style-type: none"> July 15, 2005 – Notice of Related Action filed with the Judicial Panel on Multidistrict Litigation <ul style="list-style-type: none"> July 18, 2005 – Amended Notice of Related Action filed with the Judicial Panel on Multidistrict Litigation
Kentucky v. Warrick Pharmaceuticals Corp., Case No. 05-CV-49;		Removed to E.D. Ky.	<ul style="list-style-type: none"> August 9, 2005 – Conditional Transfer Order 25 Tag-Along Actions by the Judicial Panel on Multidistrict Litigation with Notice of Opposition Due On or Before August 24, 2005 <ul style="list-style-type: none"> August 22, 2005 – Judicial Panel on Multidistrict Litigation Receipt of Notice of Opposition for <i>Pennsylvania v. TAP Pharmaceutical Products</i> (05-3604) and Set Response Date for Motion and Brief Due September 6, 2005 August 24, 2005 – Judicial Panel on Multidistrict Litigation Receipt of Notice of Opposition for <i>Illinois v. Abbott Laboratories</i> (05-4056), <i>Kentucky v. Alpharma Inc.</i> (05-47), <i>Kentucky v. Abbott Laboratories</i> (05-48), <i>Kentucky v. Warrick Pharmaceuticals</i> (05-49), and <i>Wisconsin v. Abbott Laboratories</i> (05-408); Set Response Date for Motion and Brief Due September 8, 2005 August 25, 2005 – Judicial Panel on Multidistrict Litigation Receipt of Notice of Opposition for <i>New York v. Pharmacia Corp.</i> (05-872), <i>New York v. Aventis</i> (05-873), and <i>New York v. GlaxoSmithKline PLC</i> (05-874); Set Response Date for Motion and Brief Due September 8, 2005 August 25, 2005 – Judicial Panel on Multidistrict Litigation Receipt of Notice of Opposition for <i>Minnesota v. Pharmacia Corp.</i> (05-1394) and Set Response Date for Motion and Brief Due September 8, 2005
New York v. Aventis, Case No. 05-CV-873;		Removed to N.D.N.Y.	
New York v. GlaxoSmithKline PLC, Case No. 05-CV-874;		Removed to N.D.N.Y.	
New York v. Pharmacia Corp., Case No. 05-CV-872;		Removed to N.D.N.Y.	
Pennsylvania v. TAP Pharmaceutical Products Inc., Case No. 05-CV-3604;		Removed to E.D. Pa.	
Wisconsin v. Abbott Laboratories, Inc., Case No. 05-C-408-C;		Removed to W.D. Wis.	
Minnesota v. Pharmacia Corp., Case No. 05-CV-1394;		Removed to D. Minn.	
Florida v. Alpharma, Inc., Case No. 05-257		Removed to N.D. FL	
County of Nassau v. Abbott Labs., Inc. et al.	n/a	E.D.N.Y.	<ul style="list-style-type: none"> No pending motions
County of Erie v. Abbott Labs., Inc. et al.	n/a	W.D.N.Y.	<ul style="list-style-type: none"> No pending motions (motions previously filed with the U.S.D.C. for W.D.N.Y. need to be renewed)

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
Consolidated County Case: City of New York (S.D.N.Y.) County of Albany (N.D.N.Y.) County of Allegany (W.D.N.Y.) County of Broome (N.D.N.Y.) County of Cattaraugus (W.D.N.Y.) County of Cayuga (N.D.N.Y.) County of Chautauqua (W.D.N.Y.) County of Chenango (N.D.N.Y.) County of Fulton (N.D.N.Y.) County of Genesee (W.D.N.Y.) County of Greene (N.D.N.Y.) County of Herkimer (N.D.N.Y.) County of Jefferson (N.D.N.Y.) County of Madison (N.D.N.Y.) County of Monroe (W.D.N.Y.) County of Niagara (N.D.N.Y.) County of Oneida (N.D.N.Y.) County of Onondaga (N.D.N.Y.) County of Putnam (S.D.N.Y.) County of Rensselaer (N.D.N.Y.) County of Rockland (S.D.N.Y.) County of St. Lawrence (N.D.N.Y.) County of Saratoga (N.D.N.Y.) County of Steuben (W.D.N.Y.) County of Suffolk (E.D.N.Y.) County of Tompkins (N.D.N.Y.) County of Warren (N.D.N.Y.) County of Washington (N.D.N.Y.) County of Wayne (W.D.N.Y.) County of Westchester (S.D.N.Y.) County of Yates (W.D.N.Y.)	n/a	E.D.N.Y. N.D.N.Y. S.D.N.Y. W.D.N.Y.	<ul style="list-style-type: none"> • March 30, 2005 – County of Suffolk's Motion to Renew Its Second Motion to Compel the Production of Discovery From the Schering-Plough Corporation <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ April 6, 2005 – Schering Plough's Opposition to County of Suffolk's Motion to Renew Its Second Motion to Compel the Production of Discovery • June 15, 2005 – Redacted Consolidated Complaint filed in the United States District Court for the District of Massachusetts <ul style="list-style-type: none"> ○ June 15, 2005 – Plaintiffs' Motion for Leave to File Consolidated Complaint Under Seal ○ June 22, 2005 – Corrected Consolidated Complaint filed in the United States District Court for the District of Massachusetts ○ June 23, 2005 – Motion for Leave to File Consolidated Complaint Under Seal Denied. Defendants seeking redactions ordered to file affidavits within ten days. ○ July 11, 2005 – Order modifying June 23, 2005 Order and extending time to file affidavits. ○ July 20, 2005 – Defendants' Motion to Compel Disclosure from Plaintiffs and for an Extension of Time to Comply with July 8, 2005 Order ○ July 29, 2005 – Plaintiffs' Opposition to Defendants' Motion to Compel Disclosure and for Extension of Time to Comply with July 8, 2005 Order ○ August 16, 2005 – Notice of Hearing on Motion to Compel Disclosure by Plaintiffs and for an Extension of Time to Comply with July 8, 2005 Order Set for September 19, 2005 before Magistrate Judge Marianne B. Bowler ○ August 23, 2005 – Notice of Voluntary Dismissal of Andrx Corporation ○ August 23, 2005 – Notice of Voluntary Dismissal of Alcon Laboratories, Inc. ○ August 23, 2005 – Notice of Voluntary Dismissal of Berlex Laboratories, Inc. ○ August 23, 2005 – Notice of Voluntary Dismissal of Novo Nordisk Pharmaceuticals, Inc. ○ August 23, 2005 – Notice of Voluntary Dismissal of Reliant Pharmaceuticals, Inc.

GOVERNMENT ENTITY CASES	MDL DOCKET NUMBER	ORIGINAL JURISDICTION	STATUS
Consolidated County Case (continued)			<ul style="list-style-type: none"> ○ August 23, 2005 – Corrected Notice of Voluntary Dismissal of Takeda Pharmaceuticals North America, Inc. ○ August 23, 2005 – Notice of Voluntary Dismissal of Gilead Sciences, Inc. ○ August 23, 2005 – Notice of Voluntary Dismissal of EISAI Inc. ○ August 23, 2005 – Notice of Voluntary Dismissal of Biovail Pharmaceuticals, Inc. ○ August 23, 2005 – Notice of Voluntary Dismissal of Allergan, Inc. ○ August 23, 2005 – Notice of Voluntary Dismissal of Genentech, Inc. ○ August 24, 2005 – Notice of Voluntary Dismissal of UCB Pharma, Inc. ○ August 24, 2005 – Notice of Voluntary Dismissal of Genzyme Corporation

MDL 1456 STATUS CHART – PRIVATE CLASS CASES

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action	Master File 01-CV-12257-PBS	D. Mass. pursuant to JPML Order	<ul style="list-style-type: none"> • May 3, 2004 – Plaintiffs' Motion to Compel The Production of Documents Created During the Relevant Time Period from Defendants Abbott Laboratories, AstraZeneca, Schering Plough, Sicor and Together Rx Defendants <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ May 17, 2004 – Certain Defendants' Notice of Opposition to Plaintiffs' Motion to Compel the Production of Certain Documents and Consent Motion for an Extension of Time ○ May 26, 2004 – Notice of Withdrawal of Plaintiffs' Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant Schering-Plough (<i>Note: withdrawal applies only to Schering-Plough</i>) ○ May 27, 2004 – Consent Motion for an Extension of Time to Oppose the Motion to Compel ○ May 27, 2004 – Opposition of the Together Rx Defendants to Plaintiffs' Motion to Compel the Production of Documents ○ May 28, 2004 – Notice Of Withdrawal Of Plaintiffs' Motion To Compel The Production Of Documents Created During The Relevant Time Period Directed at Defendant Abbott Laboratories (<i>Note: withdrawal applies only to Abbott Laboratories</i>) ○ June 8, 2004 – Notice of Withdrawal of Plaintiffs' Motion to Compel the Production of Documents Created During the Relevant Time Period Directed at Defendant AstraZeneca. (<i>Note: withdrawal applies only to AstraZeneca</i>) ○ June 9, 2004 – Plaintiffs' Reply Memorandum In Support of Motion To Compel The Production of Documents Created During The Relevant Time Period From The Together Rx Defendants ○ June 22, 2004 – Order granting Plaintiffs' Motion to Withdraw Motion to Compel Directed at Abbott Laboratories ○ June 22, 2004 – Order granting AstraZeneca's Assented to Motion for Extension of Time to File Response to Plaintiffs' Motion to Compel ○ June 22, 2004 – Order finding as Moot AstraZeneca's Motion for Extension of Time to Oppose Plaintiffs' Motion to Compel ○ Awaiting scheduling of hearing or ruling by Court as to Together Rx Defendants. • February 3, 2005 – Plaintiffs' Motion to Compel and for Finding that

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<p>AstraZeneca's Pricing, Marketing, and Sales of its Products are not Protected by the Attorney-Client Privilege <i>sub judice</i> (Magistrate Judge Bowler)</p> <ul style="list-style-type: none"> ○ February 24, 2005 – AstraZeneca Pharmaceuticals LP's Opposition to Plaintiffs' Motion to Compel and for Finding that AstraZeneca's Pricing, Marketing, and Sales of its Products are not Protected by the Attorney-Client Privilege, and Cross-Motion for a Protective Order Relating to the April 2, 2004 Amended Notice of Rule 30(b)(6) Deposition ○ March 20, 2005 – Reply in Support of Plaintiffs' Motion to Compel and For Finding That Documents and Testimony Related to AstraZeneca's Pricing, Marketing and Sales of Its Products Are Not Protected by the Attorney-Client Privilege and Opposition to AstraZeneca's Cross-Motion for a Protective Order ○ May 31, 2005 – Affidavit of Stuart Fullerton in response to Court Order dated May 17, 2005 ○ August 31, 2005 – Motion for Leave to File Supplement to Plaintiffs' Motion to Compel and for Finding that Documents and Testimony Related to AstraZeneca's Pricing, Marketing and Sales of Its Products Are Not Protected by the Attorney-Client Privilege Under Seal ● February 23, 2005 – Third Party Schaller Anderson Inc.'s Objection and Motion to Quash Plaintiffs' Subpoena ● March 21, 2005 – B. Braun Medical Inc.'s Motion to Dismiss the Second Amended Master Consolidated Class Action Complaint <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ April 4, 2005 – Class Plaintiffs' Opposition to B. Braun Medical Inc.'s Motion to Dismiss the Second Amended Master Consolidated Class Action Complaint ○ April 27, 2005 – B. Braun Medical Inc.'s Reply Memorandum in Support of Its Motion to Dismiss the Second Amended Master Consolidated Class Action Complaint ○ June 7, 2005 – Motion referred to Magistrate Judge Marianne B. Bowler ○ June 17, 2005 – Class Plaintiffs' Notice of Supplemental Authority in Support of Their Opposition to B. Braun Medical Inc.'s Motion to Dismiss the Second Amended Master Consolidated Class Action

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<p>Complaint</p> <ul style="list-style-type: none"> ○ June 28, 2005 – B. Braun Medical Inc.'s Response to Plaintiffs' Notice of Supplemental Authority in Support of Their Opposition to B. Braun Medical Inc.'s Motion to Dismiss the Second Amended Master Consolidated Class Action Complaint ○ Motion hearing held on July 14, 2005 <ul style="list-style-type: none"> ● May 23, 2005 – B. Braun Medical Inc.'s Motion for a Protective Order Staying Discovery Pending Resolution of its Motion to Dismiss <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ June 6, 2005 – Plaintiffs' Opposition to B. Braun Medical Inc.'s Motion for a Protective Order Staying Discovery Pending Resolution of its Motion to Dismiss ● June 14, 2005 – Defendant Sicor Inc. and Sicor Pharmaceuticals, Inc.'s motion for Protective Order with Memorandum in Support <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ June 28, 2005 – Plaintiffs' Response to Sicor's Motion for Protective Order ○ July 7, 2005 – Motion for Leave to File Reply to Plaintiffs' Response to Sicor's Motion for Protective Order ● July 6, 2005 – Plaintiffs' Motion for Leave to Set Aside the Ten Deposition Limit with Respect to Defendant AstraZeneca <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ July 20, 2005 – AstraZeneca Pharmaceutical LP's Opposition to Plaintiffs' Motion for Leave to Set Aside the Ten Deposition Limit with Respect to Defendant AstraZeneca ○ July 21, 2005 – Plaintiffs' Notice Regarding Their Motion for Leave to Set Aside the Ten Deposition Limit with Respect to Defendant AstraZeneca and Emergency Request for Immediate Oral Argument ○ July 22, 2005 – Response of AstraZeneca Pharmaceuticals LP to Plaintiffs' Emergency Request for Immediate Oral Argument with Respect to Plaintiffs' Motion to Set Aside the Ten Deposition Limit ○ August 16, 2005 – Notice of Hearing on Motion Set for September 19, 2005 before Magistrate Judge Marianne B. Bowler ○ August 31, 2005 – Supplement to Plaintiffs' Motion for Leave to Set Aside the Ten Deposition Limit with Respect to Defendant AstraZeneca regarding 30(b)(6) Deposition Related to Sales

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<p>Training</p> <ul style="list-style-type: none"> ▪ August 31, 2005 – Motion for Leave to File Exhibits D and E of Supplement to Plaintiffs' Motion for Leave to Set Aside the Ten Deposition Limit with Respect to Defendant AstraZeneca regarding 30(b)(6) Deposition Related to Sales Training Under Seal • July 18, 2005 – Plaintiffs' Motion to Compel the Supplementation of AstraZeneca's Privilege Logs, or in the Alternative, to Compel the Production of Inadequately Described Documents <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ August 1, 2005 – AstraZeneca Pharmaceuticals LP's Opposition to Plaintiffs' Motion to Compel the Supplementation of AstraZeneca's Privilege Logs, or in the Alternative, to Compel the Production of Inadequately Described Documents ○ August 15, 2005 – Reply in Support of Plaintiffs' Motion to Compel the Supplementation of AstraZeneca's Privilege Logs or, in the Alternative, to Compel the Production of Inadequately Described Documents ○ August 15, 2005 – Plaintiffs' Motion for Leave to File Under Seal Appendix J to Reply in Support of Plaintiffs' Motion to Compel the Supplementation of AstraZeneca's Privilege Logs or, in the Alternative, to Compel the Production of Inadequately Described Documents (Certificate of Service filed on August 16, 2005) ○ August 16, 2005 – Notice of Hearing on Motion Set for September 19, 2005 before Magistrate Judge Marianne B. Bowler • July 21, 2005 – Track 1 Defendants' Motion to Compel Plaintiffs to Answer Two Interrogatories Which Seek the Identity of the Drugs that Plaintiffs Allege Were "Unaffected By the AWP Scheme" <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ August 4, 2005 – Plaintiffs' Opposition to Track 1 Defendants' Motion to Compel Plaintiffs to Answer Interrogatories Which Seek the Identity of the Drugs that Plaintiffs Allege Were "Unaffected By the AWP Scheme" ○ August 16, 2005 – Notice of Hearing on Motion Set for September 19, 2005 before Magistrate Judge Marianne B. Bowler • July 28, 2005 -- Plaintiffs' Motion to Compel Deposition of Erik Q. Schultz

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<p>and For Order Assessing Fees and Costs <i>sub judice</i> (Magistrate Judge Bowler)</p> <ul style="list-style-type: none"> ○ August 15, 2005 – Supplemental Facts in Support of Plaintiffs' Motion to Compel Deposition of Erik Q. Schultz and For Order Assessing Fees and Costs ○ August 16, 2005 – Notice of Hearing on Motion Set for September 19, 2005 before Magistrate Judge Marianne B. Bowler ● August 3, 2005 – GlaxoSmithKline's Motion for Protective Order to Prohibit the Depositions of Attorneys Ursula Bartels and Adrianna Carter <i>sub judice</i> (Magistrate Judge Bowler) <ul style="list-style-type: none"> ○ August 17, 2005 – Plaintiffs' Opposition to Defendant GlaxoSmithKline, Inc.'s Motion for a Protective Order to Prohibit the Depositions of Ursula Bartels and Adrianna Carter ○ August 26, 2005 – GlaxoSmithKline's Motion to Strike Plaintiffs' Opposition to, or for Leave to File a Reply in Support of, Motion for Protective Order to Prohibit the Depositions of Attorneys Ursula Bartels and Adrianna Carter ○ August 26, 2005 – GlaxoSmithKline's Reply in Support of Motion for Protective Order to Prohibit the Depositions of Attorneys Ursula Bartels and Adrianna Carter ○ August 26, 2005 – Notice of Hearing on Motion for Protective Order Set for September 19, 2005 before Magistrate Judge Marianne B. Bowler ● August 16, 2005 – Plaintiffs' Motion to Compel the Johnson & Johnson Group to Produce Documents and for an Extension of Discovery <ul style="list-style-type: none"> ○ August 31, 2005 – Johnson & Johnson and Ortho Biotech Products L.P.'s Opposition to Plaintiffs' Motion to Compel the Johnson & Johnson Group to Produce Documents and for an Extension of Discovery and Johnson & Johnson and Ortho Biotech Products L.P.'s Cross Motion for Sanctions ● August 29, 2005 – Plaintiffs' Motion for Leave to File Under Seal Their Motion to Compel Parexel International Corporation to Comply with Fed. R. Civ. P. 30(b)(6) ● August 30, 2005 – Track 1 Defendants' Petition for Review of Memorandum and Order Dated August 16, 2005 Regarding Class

PRIVATE CLASS CASES	MDL DOCKET NO.	ORIGINAL JURISDICTION	STATUS
Master Consolidated Class Action (continued)			<p>Certification</p> <ul style="list-style-type: none"> August 31, 2005 – Plaintiffs' Motion for Leave to File Plaintiffs' Motion to Compel the Deposition of David Brennan Under Seal
International Union of Operating Engineers, Local No. 68 Welfare Fund v. AstraZeneca PLC et al.	04-11503-PBS	Removed to D.N.J.	<ul style="list-style-type: none"> Motion to Remand filed in District of New Jersey prior to transfer; briefed while pending in District of New Jersey <ul style="list-style-type: none"> April 22, 2005 – Supplemental Brief in Support of Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund May 3, 2005 – Rejection of Supplemental Brief in Support of Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund May 6, 2005 – Supplemental Brief in Opposition to Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund due to be filed June 1, 2005 – Supplemental Brief in Support of Motion for Remand by Plaintiff International Union of Operating Engineers Local No. 68 Welfare Fund re-filed July 20, 2005 – Notice of Supplemental Authority August 19, 2005 – Memorandum and Order: AstraZeneca Shall Submit an Affidavit Explaining Factual Basis for Statement in Notice of Removal within 30 days; and All Discovery on Fraudulent Joinder Claims Shall be Completed within 60 days